

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Omnicom Group, Inc. ERISA Litigation

Consolidated Case No.:
1:20-cv-04141-CM-SLC

**UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Plaintiffs, Carol Maisonette, Shane Tepper, Surfina Adams, Michael Mensack, and Daniel Dise (collectively, “Plaintiffs”), on behalf of the proposed Settlement Class and the Omnicom Group Retirement Savings Plan (the “Plan”), hereby move pursuant to Federal Rule of Civil Procedure 23 for entry of an Order that: (1) preliminarily approves the Settlement with Defendants, Omnicom Group, Inc., the Board of Directors of Omnicom Group, Inc., the Administrative Committee of the Omnicom Group Retirement Savings Plan, and Does No. 1-20 (collectively, “Defendants”), as memorialized in the Settlement Agreement dated June 23, 2023 and exhibits thereto;¹ (2) finds that the Class may be maintained through such time as the Court enters an order granting final approval of the Settlement; (3) approves the proposed notice plan (“Notice Plan”) in the Settlement Agreement and proposed Preliminary Approval Order; and (4) sets a final approval hearing on a date convenient for the Court at least 140 days after the entry of a preliminary approval order. A proposed Preliminary Approval Order is attached as Exhibit C to the Settlement Agreement.

¹The Settlement Agreement and its exhibits are attached to the accompanying Declaration of Laurie Rubinow. Terms not defined herein shall have the same meaning as in the Settlement Agreement.

For the reasons set forth in the Settlement Agreement, accompanying memorandum of law and all supporting papers, as well as the record in this litigation, Plaintiffs respectfully submit that the Settlement is fair, reasonable, and adequate, and should be preliminarily approved so that notice can be provided to the Settlement Class.

The Settlement is the product of arm's-length negotiations between the parties and their counsel, all of whom comprehensively litigated this matter, are well-informed regarding all the issues in this litigation, and have significant experience in complex litigation of this type. Accordingly, Plaintiffs respectfully request that the Court enter the proposed Preliminary Approval Order.

Plaintiffs stand ready to provide any additional information that the Court may require in connection with its consideration of the Motion.

DATED: June 23, 2023

Respectfully submitted,

/s/ Laurie Rubinow

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